

**IN THE COURT OF APPEALS
FIFTH JUDICIAL DISTRICT OF TEXAS
AT DALLAS**

JUAN CARLOS FLORES,
Appellant

vs.

THE STATE OF TEXAS,
Appellee

§
§
§
§
§
§

FILED IN
5th COURT OF APPEALS
DALLAS, TEXAS
5/6/2019 10:43:00 AM
LISA MATZ
Clerk
NO. 05-19-00034-CR

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE COURT OF APPEALS:

COMES NOW JUAN CARLOS FLORES, Appellant, by and through counsel on appeal, Jeromie Oney, and files this motion for an extension of 30 days in which to prepare and file Appellant's Brief. In support of this motion the Appellant would show the following:

1. This cause is styled *Juan Carlos Flores v. State of Texas* and is numbered 069074 in the trial court and No. 05-19-00034-CR in the Court of Appeals – 5th District of Texas.
2. The Appellant's Brief in this cause is due to be filed in the Court of Appeals on or before May 4, 2019.
3. This is the Appellant's first request for an extension of time to file the Appellant's brief.

4. The Appellant hereby requests an extension of thirty (30) days, until June 4, 2019, to file the Appellant's Brief as Attorney for appellant has not had sufficient time to prepare Appellant's brief on or before May 4, 2019.
5. Undersigned counsel has not had sufficient time to review the record and prepare Appellant's Brief due to an extensive criminal practice that requires personal appearances in several courts in several counties. Additionally, in addition to preparing this appeal, counsel has been preparing for a trial scheduled for May 13, 2019 in the 59th District Court of Grayson County, Texas where in the defendant has been charged with the offense of Murder.
6. This motion is not filed for purposes of delay, but so that there will be sufficient time to effectively prepare Appellant's Brief.

WHEREFORE, PREMISES CONSIDERED, the undersigned counsel respectfully prays that this Honorable Court extend the time for filing Appellant's Brief in this cause until June 5, 2019.

Respectfully submitted,

Switzer | Oney Attorneys at Law, PLLC

/s/ Jeromie Oney

Jeromie Oney

P.O. Box 2040

Gainesville, Texas 76241

(940) 665-6300

Fax: (940) 665-6301

State Bar No. 24042248

ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Motion for Extension of Time to File Appellant's Brief was served on the Grayson County District Attorney's Office, on the 5th day of May 2019.

\s\ Jeromie Oney _____
Jeromie Oney

CERTIFICATE OF CONFERENCE

I hereby certify that a conference was held with the Grayson County District Attorney's Office and the State does not oppose the Appellant's foregoing motion.

\s\ Jeromie Oney _____
Jeromie Oney